

EXHIBIT I

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Sean Bennett, an individual,
Plaintiff,

vs.

City of Phoenix, a governmental entity;
American Airlines, Inc., a foreign
corporation; Officer Joel Cottrell and Jane
Doe Cottrell, a married couple; Officer
Benjamin Denham and Jane Doe Benham,
a married couple; Officer Todd Blanc and
Jane Doe Blanc, a married couple; Officer
Peru and Jane Doe Peru, a married couple;
Sergeant Hogan and Jane Doe Hogan, a
married couple,
Defendants.

No.: CV-23-02425-PHX-ROS (DMF)

**PLAINTIFF'S RESPONSE TO
DEFENDANT'S REQUESTS FOR
ADMISSION**

(Assigned to the Honorable Roslyn O.
Silver and referred to the Honorable
Deborah M. Fine for all pretrial
proceedings)

Through counsel undersigned and pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Sean Bennett ("Plaintiff") hereby responds to the Requests for Admission ("RFAs") propounded upon him by Defendant American Airlines, Inc. ("American Airlines") as follows:

RFA 1: Admit YOU lived in Alaska from 2005 to 2024.

1 **RESPONSE:** Admit. Plaintiff was stationed in and outside Alaska since 2005. Plaintiff
2 lived in Alaska during the summer months during that timeframe, but in the “Lower 48”
3 during the winter.
4

5 **RFA 2:** Admit YOU moved to Oklahoma in 2024.

6 **RESPONSE:** Admit because Plaintiff needed medically necessary care unavailable to him
7 in Alaska.
8

9 **RFA 3:** Admit YOU consumed alcohol on August 13, 2021, prior to the INCIDENT.

10 **RESPONSE:** Admit that Plaintiff consumed one beer in his first class seat on the leg prior
11 to the Incident from Chicago to Phoenix.

12 **RFA 4:** Admit YOU consumed prescription drugs on August 13, 2021, prior to the
13 INCIDENT.
14

15 **RESPONSE:** Deny.

16 **RFA 5:** Admit that YOU were chewing tobacco while onboard the SUBJECT
17 AIRCRAFT.

18 **RESPONSE:** Deny.
19

20 **RFA 6:** Admit that YOU were not properly wearing YOUR mask through the
21 duration of
22 time in which YOU were onboard the SUBJECT AIRCRAFT.

23 **RESPONSE:** Deny.
24

25 **RFA 7:** Admit that the flight crew had to tell you multiple times to put YOUR mask
26 on while onboard the SUBJECT AIRCRAFT.

27 **RESPONSE:** Deny.
28

1 **RFA 8:** Admit that, when you boarded the SUBJECT AIRCRAFT, YOU sat in seat
2 27D.

3 **RESPONSE:** Deny. Plaintiff sat in his assigned seat.

4
5 **RFA 9:** Admit that YOUR preselected seat for the SUBJECT AIRCRAFT was 27B.

6 **RESPONSE:** Admit.

7 **RFA 10:** Admit that, at the time the flight attendant asked YOU to move seats, YOU
8 were not sitting in the seat YOU had preselected/purchased.

9
10 **RESPONSE:** Deny.

11 **RFA 11:** Admit that, while onboard the SUBJECT AIRCRAFT, YOU loudly
12 announced to everyone that YOU had “killed people before.”

13 **RESPONSE:** Deny. Plaintiff merely referenced his distinguished military career.

14
15 **RFA 12:** Admit that, while a flight attendant was attempting to conduct the pre-
16 departure safety briefing, onboard the SUBJECT AIRCRAFT, YOU yelled “get on
17 with your speech.”

18 **RESPONSE:** Deny.

19
20 **RFA 13:** Admit that other passengers yelled for you to get off the SUBJECT
21 AIRCRAFT on August 13, 2021.

22 **RESPONSE:** Deny. Plaintiff recalls passengers yelling, but only because the Flight
23 Attendant came screaming at Plaintiff that she would deboard the entire flight.

24
25 **RFA 14:** Admit that, as YOU exited the SUBJECT AIRCRAFT, on August 13, 2021,
26 another passenger told YOU “that could have got really bad.”

1 **RESPONSE:** Deny. Plaintiff told the other service member who approached him “thank
2 you” and “That could have gone worse”.

3
4 **RFA 15:** Admit that no American Airlines employee physically touched YOU on
5 August 13, 2021.

6 **RESPONSE:** Admit. However, Plaintiff was blocked by a Flight Attendant and could not
7 physically fit around the FA until the other service member created space for Plaintiff.

8 **RFA 16:** Admit that failure to comply with flight crew instructions can pose a safety
9 risk for everyone on board a flight.
10

11 **RESPONSE:** Admit.

12 **RFA 17:** Admit that, on August 13, 2021, YOU were required by law to comply with
13 the flight crew’s instructions while onboard the SUBJECT AIRCRAFT.
14

15 **RESPONSE:** Admit.

16 **RFA 18:** Admit YOU did not suffer any physical injury while onboard the SUBJECT
17 AIRCRAFT.

18 **RESPONSE:** Admit.

19
20 **RFA 19:** Admit YOU did not suffer any physical injury while exiting the SUBJECT
21 AIRCRAFT on August 13, 2025.

22 **RESPONSE:** Admit.

23 **RFA 20:** Admit YOU did not have any physical interactions with any American
24 Airlines employee after deplaning SUBJECT AIRCRAFT and exiting the jet bridge,
25 on August 13, 2021.
26

27 **RESPONSE:** Admit.
28

1 **RFA 21:** Admit the officers who approached YOU, after YOU exited the SUBJECT
2 AIRCRAFT on August 13, 2025, were wearing police uniforms.

3 **RESPONSE:** Admit

4
5 **RFA 22:** Admit YOU flew on a commercial flight from Phoenix to Alaska on August
6 14, 2021.

7 **RESPONSE:** Admit

8
9 **RFA 23:** Admit no government agency ever told YOU that YOU were placed on a
10 “Federal No Fly List” on or after August 13, 2021.

11 **RESPONSE:** Admit – However, Plaintiff was told by American Airlines that he would be
12 put on the federal do not fly list. Plaintiff spent considerable amount of time trying to
13 determine this fact, without confirmation. He was told to just show up at the airport and
14 see if TSA would stop him.

15
16 **RFA 24:** Admit no American Airlines employee ever told YOU that YOU were placed
17 on a “Federal No Fly List” on or after August 13, 2021.

18 **RESPONSE:** Deny.

19
20 **RFA 25:** Admit YOU were never placed on a “Federal No Fly List” on or after August
21 13, 2021.

22 **RESPONSE:** Can neither admit nor deny. See Responses to RFAs 23-24.

23
24 **RFA 26:** Admit YOU were not denied service by any airline, other than American
25 Airlines, on or after August 13, 2021.

26 **RESPONSE:** Objection. Parties are limited to 25 RFAs. See August 12, 2024 Case
27 Management Order (Doc 28).

28

1 **RFA 27: Admit YOU have no evidence that American Airlines ever labeled YOU as**
2 **a “terrorist” on or after August 13, 2021.**

3 **RESPONSE:** Objection. Parties are limited to 25 RFAs. See August 12, 2024 Case
4 Management Order (Doc 28).
5

6 **RFA 28: Admit YOU sustained two traumatic brain injuries prior to August 13, 2021.**

7 **RESPONSE:** Objection. Parties are limited to 25 RFAs. See August 12, 2024 Case
8 Management Order (Doc 28).
9

10 **RFA 29: Admit none of YOUR physicians attribute YOUR stroke in 2023 to the**
11 **INCIDENT.**

12 **RESPONSE:** Objection. Parties are limited to 25 RFAs. See August 12, 2024 Case
13 Management Order (Doc 28).
14

15 **RFA 30: Admit the officers involved in the INCIDENT were not employees or agents**
16 **of American Airlines.**

17 **RESPONSE:** Objection. Parties are limited to 25 RFAs. See August 12, 2024 Case
18 Management Order (Doc 28).
19

20 **RFA 31: Admit the officers involved in the INCIDENT were employed by the City of**
21 **Phoenix.**

22 **RESPONSE:** Objection. Parties are limited to 25 RFAs. See August 12, 2024 Case
23 Management Order (Doc 28).
24
25
26
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RESPECTFULLY SUBMITTED this 8th day of October 2025.

MILLS + WOODS LAW, PLLC

I hereby certify that on October 8, 2025, I electronically transmitted the foregoing document to the following via email: